

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

ESTATE OF OMAR RILEY,  
c/o STEVEN P. MUTERSBAUGH,  
Administrator, et al.

Plaintiffs

v.

JONI L. LAIDIG  
10521 Scenic Dr.  
Port Richey, FL 34668

Defendant

CASE NO: 5-16-cv-03022-JRA

Judge: John R. Adams

**RESPONSE TO MOTION TO DISMISS  
AND MOTION FOR LEAVE TO  
AMEND COMPLAINT**

Now come Plaintiffs, by and through counsel, and hereby responds to Defendant Joni L. Laidig's Motion to Dismiss for lack of subject matter jurisdiction. Plaintiffs request leave to amend their complaint to include additional parties and federal questions and claims. The Amended Complaint is attached hereto as Exhibit A. Furthermore, the actual residence and domicile of Defendant Joni Laidig is still in question. Therefore, the Motion to Dismiss should be denied as this case is properly before this Court on federal question jurisdiction.

Respectfully submitted,

/s/ Stanley P. Aronson  
Stanley P. Aronson – 0024836  
Attorney for Plaintiffs  
3085 W. Market St., Ste. 130  
Akron, OH 44333  
Tele: 330-836-5500/Fax: 330-836-1085  
Email: [Aronsonlaw@gmail.com](mailto:Aronsonlaw@gmail.com)

**MEMORANDUM**

Fed. R. Civ. Pro. 15 allows Courts to grant leave to amend the complaint when justice so requires. In investigating this matter further, Plaintiffs have discovered additional defendants, as well as multiple violations of federal law, and additional federal claims. An additional Plaintiff, Shirley Wallis, has also been added to this Amended Complaint, as well as an additional Defendant, Landlord Connections, Inc.. This Amended Complaint is attached hereto as Exhibit A.

Plaintiffs respectfully request this Court grant them leave to amend their complaint, and to deny Defendant's Motion to Dismiss. The Amended Complaint contains federal causes of action, and is properly before this Court.

Respectfully submitted,

s/ Stanley P. Aronson  
Stanley P. Aronson – 0024836  
Attorney for Plaintiffs  
3085 W. Market St., Ste. 130  
Akron, OH 44333  
Tele: 330-836-5500/Fax: 330-836-1085  
Email: [Aronsonlaw@gmail.com](mailto:Aronsonlaw@gmail.com)

**CERTIFICATE OF SERVICE**

This document has been filed electronically with the Court on February 13, 2017. Notice of this filing will be sent to all counsel through the Court's Electronic Filing System. Parties can access this document through the Court's system.

s/ Stanley P. Aronson  
Stanley P. Aronson – 0024836